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Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of Experts on the Regulations annexed to the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) (ADN Safety Committee)

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Item 5 (b) of the provisional agenda

Proposals for amendments to the Regulations annexed to ADN:
Other proposals

Carriage of packages in the cargo area

Transmitted by the European Barge Union (EBU)¹

Introduction

1. Paragraph 7.2.4.1 of ADN refers to the carriage of packages in the cargo area as follows:

“7.2.4.1 *Limitation of the quantities carried*

7.2.4.1.1 The carriage of packages in the cargo area is prohibited. This prohibition does not apply to:

- residual cargo, washing water, cargo residues and slops contained in not more than six approved receptacles for residual products and receptacles for slops having a maximum individual capacity of not more than 2 m³. These receptacles for residual products shall meet the requirements of international regulations applicable to the substance concerned. The receptacles for residual products and the receptacles for slops shall be properly secured in the cargo area and comply with the provisions of 9.3.2.26.4 or 9.3.3.26.4 concerning them;

¹ Distributed in German by the Central Commission for the Navigation of the Rhine under the symbol CCNR/ZKR/ADN/WP.15/AC.2/2014/6.

- cargo samples, up to a maximum of 30, of substances accepted for carriage in the tank vessel, where the maximum contents are 500 ml per receptacle. Receptacles shall meet the packing requirements referred to in Part 4 of ADR and shall be placed on board, at a specific point in the cargo area, such that under normal conditions of carriage they cannot break or be punctured and their contents cannot spill in the hold space. Fragile receptacles shall be suitably padded.

7.2.4.1.2 On board oil separator vessels receptacles with a maximum capacity of 2.00 m³ (of) oily and greasy wastes resulting from the operation of vessels may be placed in the cargo area provided that these receptacles are properly secured.

7.2.4.1.3 On board supply vessels packages of dangerous goods may be carried in the cargo area up to a gross quantity of 5,000 kg provided that this possibility is mentioned in the certificate of approval. The packages shall be properly secured and shall be protected against heat, sun and bad weather.”

2. However, in practice there are vessels which have different packages with non-hazardous products to transport (which are not mentioned in the ADN, such as lubricating oils) together with non-packaged hazardous cargo.

3. The scope of ADN (as stated in 1.1.2) is the carriage of dangerous goods in different ways.

4. When reading 7.2.4.1.1, however, it seems that the prohibition of the carriage of packages in the cargo area, where no hazardous products are packaged or filled, also applies to non-hazardous packages.

5. There seems to be a contradiction regarding this regulation. 7.2.4.1.3 states that supply vessels may carry packages of dangerous goods in the cargo area, but on the other hand 7.2.4.1.1 states that the carriage of packages in the cargo area is prohibited. Theoretically, this means that supply vessels and bunkering facilities cannot carry packages with non-hazardous cargo, such as lubricating oils in barrels or jerry cans.

Amendment proposal

6. The EBU proposes the amendment of 7.2.4.1.1 by adding the words “of dangerous goods”:

“The carriage of packages **of dangerous goods** in the cargo area is prohibited. This prohibition does not apply to:...”

7. By amending this article, the safety level will not be directly increased or decreased but it will clarify the situation of the carriage of packages with non-hazardous cargo.
